

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**U.S. SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**SIMING YANG, PRESTIGE TRADE
INVESTMENTS LIMITED, CAIYIN FAN
and SHUI CHONG (ERIC) CHANG,**

Defendants.

Case No. 12-cv-02473

Honorable Matthew F. Kennelly

**JOINT MOTION FOR ENTRY OF FINAL JUDGMENT,
BY CONSENT, AGAINST DEFENDANT SHUI CHONG (ERIC) CHANG
AND ORDER DISBURSING FUNDS AND DISSOLVING ASSET FREEZE**

Plaintiff U.S. Securities and Exchange Commission (the “Commission”) and Defendant Shui Chong (Eric) Chang (“Chang”) hereby jointly move for entry of a Final Judgment as to Chang in the form attached hereto as Exhibit A and an Order Disbursing Funds and Dissolving Asset Freeze in the form attached hereto as Exhibit C. In support of this motion, the Commission and Chang state as follows:

1. The Commission and Chang have reached a proposed settlement in this action, which would resolve the claims asserted against Chang.
2. Attached hereto as Exhibit A is a proposed Final Judgment as to Chang.
3. Attached hereto as Exhibit B is the executed Consent of Chang, in which he has agreed to the terms of the proposed Final Judgment and consented to its immediate entry.
4. The proposed Final Judgment provides for, among other things:

- a. a permanent injunction against Chang prohibiting him from future violations of the provisions of the federal securities laws that the Commission alleges Chang violated;
- b. an order requiring Chang to pay disgorgement in the amount of \$59,965, plus prejudgment interest thereon in the amount of \$3,062.67; and
- c. an order requiring Chang to pay a civil penalty in the amount of \$59,965.

5. Entry of the proposed Final Judgment as to Chang will further the interests of justice and judicial economy.

6. The Commission and Chang agree that the disgorgement, prejudgment interest and civil penalty required by the Final Judgment should be paid from the frozen assets held in Chang's brokerage account with E*Trade Financial (Account No. 7****968) and that the asset freeze should be lifted in its entirety after the amounts due under the Final Judgment are paid. Attached hereto as Exhibit C is a proposed Order Disbursing Funds and Dissolving Asset Freeze that would give effect to the parties' agreement.

WHEREFORE, for the foregoing reasons, the Commission and Chang respectfully request that the Court grant this motion and enter the proposed *Final Judgment as to Defendant Shui Chong (Eric) Chang*, a copy of which is attached hereto as Exhibit A, and the proposed *Order Disbursing Funds and Dissolving Asset Freeze*, a copy of which is attached hereto as Exhibit C.

Dated: February 3, 2014

Respectfully Submitted by,

s/ Robert R. Cohen
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*One of the Attorneys for
Shui Chong (Eric) Chang*

s/ Jedediah B. Forkner
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*One of the Attorneys for
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CERTIFICATE OF SERVICE

I, Jedediah B. Forkner, an attorney for Plaintiff U.S. Securities and Exchange Commission, hereby certify that, on February 3, 2014, I caused true and correct copies of the foregoing motion to be served on all counsel of record via the CM/ECF system.

s/ Jedediah B. Forkner _____